

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

Grand Jury N-04-3

UNITED STATES OF AMERICA : Criminal No. \_\_\_\_\_  
v. : Violations:  
AMIT PATEL : 8 U.S.C. § 1324(a)(1)(A)(v)  
a/k/a/ "Dilip" : **(Conspiracy to Encourage Aliens  
to Illegally Come to or Reside  
in the United States)**  
: 8 U.S.C. § 1324(a)(1)(A)(ii)  
**(Illegally Transporting Aliens)**  
: 8 U.S.C. § 1324(a)(1)(A)(iv)  
**(Inducing Aliens to Illegally  
Come to or Reside in the U.S.)**  
8 U.S.C. § 1324(a)(2)(B)  
**(Illegally Bringing In Aliens)**  
8 U.S.C. § 1324(a)(2)(B)(ii)  
**(Bringing in Alien for  
Commercial Gain)**

**INDICTMENT**

The Grand Jury charges:

**General Allegation**

1. AMIT PATEL, a/k/a/ "Dilip," the defendant, is a native and citizen of India who was born on or about August 27, 1967. He last entered the United States in or about June 2003 on advanced parole. At all times relevant to this indictment, AMIT PATEL has resided in Connecticut.

**COUNT ONE**

**(The Conspiracy To Encourage Aliens to  
Illegally Come to or Reside in the United States)**

2. The factual allegations set forth in paragraph 1 are repeated and re-alleged as if set forth fully herein.

3. From in or about 2003 to on or about April 24, 2004, in the District of Connecticut and elsewhere, AMIT PATEL, a/k/a/ "Dilip", the defendant, and others known and unknown, unlawfully, willfully, and

knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 8, United States Code, Sections 1324(a)(1)(A)(ii) & (iv).

4. It was part and an object of the conspiracy that PATEL, and others known and unknown, unlawfully, willfully and knowingly would and did encourage and induce aliens to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of Title 8, United States Code, Section 1324 (a)(1)(A)(iv).

5. It was further a part and an object of the conspiracy that PATEL and others, known and unknown, knowing and in reckless disregard of the fact that aliens had come to, entered, and remained in the United States in violation of law, unlawfully, willfully, and knowingly would and did transport, and move and attempt to transport and move such aliens within the United States by means of transportation, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

#### **Overview of the Conspiracy**

6. From in or about 2003, the exact date unknown to the Grand Jury, to on or about April 24, 2004, AMIT PATEL and unnamed and unknown co-conspirators ("co-conspirators") devised a plan to bring aliens to the United States knowingly and in reckless disregard of the fact that none of these aliens had received prior official authorization to come to, enter, or reside in the United States. To carry out this plan, co-conspirators residing in Great Britain, the United States, and elsewhere, would provide aliens with photo-

substituted British passports and accompany them on flights from England to the United States. Once in the United States the co-conspirator courier would deliver the illegal alien to a facilitator in the United States. The courier would then depart the United States, leaving the illegal alien here in the United States.

7. The known co-conspirators are all residing in Great Britain. The known co-conspirators include: Harikrishna Patel, Mohammad Gajra, Anilkumar Patel, Stephen Brownson, Hitesh Gohel, Stephen Denness, Shakuntlaben Patel, David Dymott, Rushil Patel, Jaisal Patel, Rajnikant Patel, Manibhai Patel, Ramzan Gajra, and Mitesh Bakhai.

#### **OVERT ACTS**

8. In furtherance of the conspiracy and to effect the illegal objects thereof, PATEL and other co-conspirators committed the following overt acts, among others, in the District of Connecticut and elsewhere:

a. On or about June 20, 2003, a co-conspirator of PATEL'S who was acting as a courier and an alien traveling on a lost British passport purporting to be Hansha Patel traveled together from Heathrow Airport, London, England to Miami, Florida on British Airways flight BA207. PATEL received the alien purporting to be Hansha Patel from the courier and traveled with her within the United States. The courier returned to England. The alien purporting to be Hansha Patel is believed to be illegally residing in the United States.

b. On or about July 18, 2003 a courier and an alien traveling on a stolen British passport purporting to be Bipin Vadhavana traveled together from Heathrow Airport, London, England to

Miami, Florida on British Airways flight BA209. AMIT PATEL received the alien purporting to be Bipin Vadhavana from the courier. The courier returned to England. The person purporting to be Bipin Vadhavana is believed to be residing illegally in the United States.

c. On or about August 7, 2003, a courier and a person traveling on a stolen British passport purporting to be Parveen Kousur traveled together from Heathrow Airport, London, England to Miami, Florida on British Airways flight BA207. PATEL received the alien purporting to be Parveen Kousur and traveled with her to Connecticut. The courier returned to England. The alien purporting to be Parveen Kousur is believed to be residing in Connecticut.

d. On or about September 6, 2003 a courier and a person traveling on a lost British passport purporting to be Amit Suji traveled together from Heathrow Airport, London, England to New York on British Airways flight BA115. PATEL received the alien purporting to be Amit Suji from the courier. The courier returned to England. The alien purporting to be Amit Suji is believed to be residing illegally in the United States.

e. On or about October 22, 2003 a courier and an alien traveling on the lost British Passport of Rubin Sultan Jamal, traveled together from Heathrow Airport, London, England to Chicago on British Airways flight BA297. PATEL received the alien purporting to be Rubin Sultan Jamal from the courier. The courier returned to England. The alien purporting to be Rubin Sultan Jamal is believed to be residing illegally in the United States.

f. On or about November 1, 2003 a courier and a person traveling on a lost British Passport purporting to be Naresh Samji

traveled from Heathrow, London to Newark, New Jersey on British Airways flight BA189. The courier returned to England. PATEL received the alien purporting to be Naresh Samji from the courier. The alien purporting to be Naresh Samji is believed to be illegally residing in the United States.

g. On or about December 6, 2003 a courier traveling on a lost British passport purporting to be Kuldip Kaur Rai traveled together from Gatwick Airport, London, England to Atlanta, Georgia on British Airways flight BA2227. PATEL received the person purporting to be Kudip Kaur Rai from the courier. The courier returned to England. The alien purporting to be Kudip Kaur Rai is believed to be illegally residing in the United States.

h. On December 28, 2003, a courier and a person traveling on a stolen British passport purporting to be Nanji Patel, traveled together from Heathrow Airport, London, England to Newark, New Jersey on British Airways flight BA189. PATEL received the person purporting to be Nanji Patel. The courier returned to Mumbai, India. The alien purporting to be Nanji Patel is believed to be residing illegally in the United States.

i. On or about December 28, 2003, a courier and a person traveling on a stolen British passport purporting to be Chetna Patel traveled together from Heathrow Airport, London, England to Newark, New Jersey on British Airways flight BA189. The courier returned to Mumbai, India alone. PATEL received the person purporting to be Chetna Patel. The alien purporting to be Chetna Patel is believed to be residing illegally in the United States.

j. On or about January 16, 2004, a courier and a person traveling on a stolen British passport purporting to be Ricky Raval traveled together from Gatwick Airport, London, England to Orlando, Florida on British Airways flight BA2037. PATEL received the person purporting to be Ricky Raval. The courier returned to England. The alien purporting to be Ricky Raval is believed to be residing illegally in the United States.

k. On or about February 15, 2004, a courier and an individual traveling on the stolen British passport of Chetna Patel traveled together from Gatwick Airport, London, England to Orlando, Florida on British Airways flight BA2039. AMIT PATEL received the alien purporting to be Chetna Patel. The courier returned to England. The alien purporting to be Chetna Patel is believed to be residing illegally in the United States.

l. On or about February 15, 2004, a courier and an alien traveling on a lost British passport purporting to be Nanji Patel traveled together from Gatwick Airport, London, England to Orlando, Florida on British Airways flight BA2039. PATEL received the person purporting to be to be Nanji Patel. The courier returned to England. The alien purporting to be Nanji Patel is believed to be illegally residing in the United States.

m. On or about February 18, 2004, a courier and a person purporting to be Nealofar Gajra, attempted to travel together from Gatwick Airport, England to Atlanta, Georgia. PATEL traveled to Atlanta, Georgia to attempt to receive the alien purporting to be Nealofar Gajra. The alien purporting to be Nealofar Gajra was not permitted to board the airplane to travel to Atlanta.

n. On or about March 5, 2004, a courier and an alien traveling on a lost British passport purporting to be Amit Suji traveled together from Gatwick Airport, London, England to Orlando, Florida on British Airways flight BA2037. PATEL received the person purporting to be Amit Suji from the courier. The courier returned to England. The alien purporting to be Amit Suji is believed to be illegally residing in the United States.

o. On or about April 24, 2004, a courier and an alien traveling on a lost British passport purporting to be Rubin Sultan Jamal, a/k/a "Mitesh Patel" traveled together from Gatwick Airport, London, England to Orlando, Florida on British Airways flight BA2037. PATEL received the alien purporting to be Rubin Sultan Jamal from the courier. The courier returned to England.

p. After receiving these aliens, PATEL either transported them to a location within the United States or arranged for their transport within the United States.

q. On certain occasions, PATEL obtained the fraudulent travel documents from the illegal aliens and mailed them back to his co-conspirators in Great Britain.

All in violation of 8 U.S.C. § 1324(a)(1)(A)(v).

**COUNTS TWO THROUGH FIFTEEN**

**(Inducing Aliens to Illegally Come to or Reside in the United States)**

9. The factual allegations set forth in paragraphs 1 through 8 are repeated and re-alleged as if set forth fully herein.

10. On or about the dates listed below, in the District of Connecticut and elsewhere, AMIT PATEL a/k/a/ "Dilip," the defendant, unlawfully, wilfully, and knowingly encouraged and induced the following aliens, as set forth below, to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was and would be in violation of law.

Count	Date	Name	Passport	From	To	Flight
2	6/20/03	Hansha Patel	British - lost (Aug 2000)	Heathrow	Miami	BA207
3	7/18/03	Bipin Vadhavna	British - stolen (2/20/00)	Heathrow	Miami	BA209
4	8/7/03	Parveen Kousar	British - stolen (Aug 2002)	Heathrow	Miami	BA207
5	9/6/03	Amit Suji	British - lost (12/27/01)	Heathrow	NY	BA115
6	10/22/03	Rubin Sultan Jamal	British - lost (6/6/00)	Heathrow	Chicago	BA297
7	11/1/03	Naresh Samji	British - lost (12/18/97)	Heathrow	Newark	BA189
8	12/6/03	Kuldip Kaur Rai	British - lost (2/13/00)	Gatwick	Atlanta	BA2227
9	12/28/03	Nanji Patel	British - stolen (7/9/03)	Heathrow	Newark	BA189
10	12/28/03	Chetna Patel	British - stolen (7/9/03)	Heathrow	Newark	BA189
11	1/16/04	Ricky Raval	British - lost (Sept 2003)	Gatwick	Orlando	BA2037
12	2/15/04	Chetna Patel	British - stolen (7/9/03)	Gatwick	Orlando	BA2039
13	2/15/04	Nanji Patel	British - stolen (7/9/03)	Gatwick	Orlando	BA2039
14	3/05/04	Amit Suji	British - lost (12/27/01)	Gatwick	Orlando	BA2037



Count	Date	Name	Passport	From	To	Flight
15	4/24/04	Rubin Sultan Jamal  (Mitesh Patel)	British - lost (6/6/00)	Gatwick	Orlando	BA2037

Each in violation of Title 8, United States Code, Section  
1324(a)(1)(A)(iv).

**COUNTS SIXTEEN THROUGH TWENTY-NINE**  
**(Illegally Bringing in Aliens)**

11. The factual allegations set forth in paragraphs 1 through 8 are repeated and re-alleged as if set forth fully herein.

12. On or about the dates listed below, in the District of Connecticut and elsewhere, AMIT PATEL, a/k/a/ "Dilip," the defendant, knowing and in reckless disregard of the fact that the following aliens, as set forth below, had not received prior official authorization to come to, enter, and reside in the United States, did bring and attempt to bring to the United States the following aliens in violation of law.

Count	Date	Name	Passport	From	To	Flight
16	6/20/03	Hansha Patel	British - lost (Aug 2000)	Heathrow	Miami	BA207
17	7/18/03	Bipin Vadhavna	British - stolen (2/20/00)	Heathrow	Miami	BA209
18	8/7/03	Parveen Kousar	British - stolen (Aug 2002)	Heathrow	Miami	BA207
19	9/6/03	Amit Suji	British - lost (12/27/01)	Heathrow	NY	BA115
20	10/22/03	Rubin Sultan Jamal	British - lost (6/6/00)	Heathrow	Chicago	BA297
21	11/1/03	Naresh Samji	British - lost (12/18/97)	Heathrow	Newark	BA189
22	12/6/03	Kuldip Kaur Rai	British - lost (2/13/00)	Gatwick	Atlanta	BA2227
23	12/28/03	Nanji Patel	British - stolen (7/9/03)	Heathrow	Newark	BA189
24	12/28/03	Chetna Patel	British - stolen (7/9/03)	Heathrow	Newark	BA189
25	1/16/04	Ricky Raval	British - lost (Sept 2003)	Gatwick	Orlando	BA2037

Count	Date	Name	Passport	From	To	Flight
26	2/15/04	Chetna Patel	British - stolen (7/9/03)	Gatwick	Orlando	BA2039
27	2/15/04	Nanji Patel	British - stolen (7/9/03)	Gatwick	Orlando	BA2039
28	2/18/04	Nealofar Gajra	British- (fraudulent application)	Gatwick	Orlando	DL11 - Delta
29	3/05/04	Amit Suji	British - lost (12/27/01)	Gatwick	Orlando	BA2037
30	4/24/04	Rubin Sultan Jamal  (Mitesh Patel)	British - lost (6/6/00)	Gatwick	Orlando	BA2037

Each in violation of Title 8, United States Code, Section 1324(a)(2).

**COUNTS THIRTY-ONE THROUGH FORTY-THREE**  
**(Illegally Transporting Aliens)**

13. The factual allegations set forth in paragraphs 1 through 8 are repeated and re-alleged as if set forth fully herein.

14. On or about the dates listed below, in the District of Connecticut and elsewhere, AMIT PATEL, a/k/a/ "Dilip," the defendant, knowing and in reckless disregard of the fact that the following aliens, as set forth below, had come to, entered, and remained in the United States in violation of law, did transport and move and attempt to transport and move said aliens within the United States by means of transportation and otherwise in furtherance of such violation.

Count	Date	Name	Passport	From	To	Flight
31	6/20/03	Hansha Patel	British - lost (Aug 2000)	Heathrow	Miami	BA207
32	7/18/03	Bipin Vadhavna	British - stolen (2/20/00)	Heathrow	Miami	BA209
33	8/7/03	Parveen Kousar	British - stolen (Aug 2002)	Heathrow	Miami	BA207
34	9/6/03	Amit Suji	British - lost (12/27/01)	Heathrow	NY	BA115
35	10/22/03	Rubin Sultan Jamal	British - lost (6/6/00)	Heathrow	Chicago	BA297
36	11/1/03	Naresh Samji	British - lost (12/18/97)	Heathrow	Newark	BA189
37	12/6/03	Kuldip Kaur Rai	British - lost (2/13/00)	Gatwick	Atlanta	BA2227
38	12/28/03	Nanji Patel	British - stolen (7/9/03)	Heathrow	Newark	BA189
39	12/28/03	Chetna Patel	British - stolen (7/9/03)	Heathrow	Newark	BA189
40	1/16/04	Ricky Raval	British - lost (Sept 2003)	Gatwick	Orlando	BA2037
41	2/15/04	Chetna Patel	British - stolen (7/9/03)	Gatwick	Orlando	BA2039
42	2/15/04	Nanji Patel	British - stolen (7/9/03)	Gatwick	Orlando	BA2039
43	3/05/04	Amit Suji	British - lost (12/27/01)	Gatwick	Orlando	BA2037

Each in violation Title 8, United States Code, Section 1324(a)(1)(A)(ii).

**COUNT FORTY-FOUR**  
**(Bringing in Alien for Commercial Gain)**

15. The factual allegations set forth in paragraphs 1 through 8 are repeated and re-alleged as if set forth fully herein.

16. On or about April 24, 2004, in the District of Connecticut and elsewhere, AMIT PATEL, a/k/a/ "Dilip," the defendant, the defendant herein, knowing and in reckless disregard of the fact that the alien purporting to be Rubin Sultan Jamal, a/k/a "Mitesh Patel" had not received prior official authorization to come to, enter, and reside in the United States, did bring and attempt to bring to the United States such alien for commercial advantage and private financial gain.

In violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
KEVIN J. O'CONNOR  
UNITED STATES ATTORNEY

\_\_\_\_\_  
PETER S. JONGBLOED  
SUPERVISORY ASSISTANT U.S. ATTORNEY

\_\_\_\_\_  
KRISHNA R. PATEL  
ASSISTANT UNITED STATES ATTORNEY